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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION**

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SMASH TECHNOLOGY, LLC, a Nevada  
limited liability company; and MICHAEL  
ALEXANDER, an individual;

Plaintiffs,  
vs.

SMASH SOLUTIONS, LLC, a Delaware  
limited liability company; JERRY "J.J."  
ULRICH, an individual; and JOHN DOES 1-3;

Defendants.

SMASH SOLUTIONS, LLC, a Delaware  
limited liability company; JERRY "J.J."  
ULRICH, an individual; and JOHN DOES 1-3;

Counterclaim Plaintiffs,  
vs.

SMASH TECHNOLOGY, LLC, a Nevada  
limited liability company; and MICHAEL  
ALEXANDER, an individual;

Counterclaim Defendants.

**STIPULATION AND MOTION FOR  
EXTENSION OF DEADLINES**

Civil No. 2:19-cv-00105-TC

Judge Tena Campbell

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Defendants, Smash Solutions, LLC and Jerry Ulrich (“Defendants”) and Plaintiffs Smash Technology, LLC and Michael Alexander (“Plaintiffs”), by and through their respective counsel of record and pursuant to DUCivR 7-1(a)(2)(A) and 7-1(b)(3)(B) hereby stipulate as follows:

**STIPULATION**

1. Defendants seek an extension of time to respond to Plaintiffs’ Motion for Leave to File First Amended Complaint (Doc. 36), filed on June 12, 2019. Defendants’ response to Plaintiffs’ Motion is due June 26, 2019. The parties agree that Defendants should have until July 1, 2019 to file a Memorandum in Opposition to Plaintiffs’ Motion for Leave to File First Amended Complaint (Doc. 36). Based on this extension, Plaintiffs’ Reply in Support of their Motion for Leave to File First Amended Complaint will be due on July 15, 2019.

2. Plaintiffs seek an extension of time to respond to Defendants’ first set of discovery requests. Plaintiffs’ responses are currently due on July 3, 2019. The parties agree that Plaintiffs should have until July 19, 2019, to respond to Defendants’ discovery requests.

3. Defendants seek an extension of time to file a Reply Memorandum in support of their Motion for Partial Summary Judgment (Doc. 32). Defendants’ Reply is currently due on July 5, 2019. The parties agree that Defendants should have until July 19, 2019, to file a Reply in support of their Motion for Partial Summary Judgment (Doc. 32).

4. Defendants seek an extension of time to respond to Plaintiffs’ first set of discovery requests. Defendants’ responses are currently due on July 10, 2019. The parties agree that Defendants should have until July 26, 2019, to respond to Plaintiffs’ discovery requests.

**MOTION**

Based on the foregoing Stipulation, Defendants move the Court pursuant to DUCivR 7-1(a)(2)(A) and 7-1(b)(3)(B) for an Order granting leave of Court to extend the above-mentioned deadlines. Defendants further state that these extensions are reasonable and necessary given the upcoming holidays in July and the ongoing health issues facing Defendant Jerry Ulrich. These extensions will not interfere with any scheduled hearing or other deadlines. Therefore, Defendants request the Court enter the proposed Order attached hereto as Exhibit A and filed concurrently herewith.

DATED this 25th day of June, 2019.

RICHARDS BRANDT MILLER NELSON

/s/ Kristina H. Ruedas

MATTHEW C. BARNECK

ZACHARY E. PETERSON

KRISTINA H. RUEDAS

*Attorneys for Defendants*

DATED this 25th day of June, 2019.

HOLLAND & HART

/s/ Darren G. Reid

*(Signed w/ permission of Darren G. Reid)*

DARREN G. REID

BRANDON T. CHRISTENSEN

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 25th day of June, 2019, I electronically filed the foregoing **STIPULATION AND MOTION FOR EXTENSION OF DEADLINES** with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

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/s/ Peggy Stockton

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